

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
District of Oregon

United States of America

)

v.

)

William Gregory Douglas

)

)

)

Case No. 1:18-mj- 00208-CL

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 22 - September 17, 2018 in the county of Josephine in the
District of Oregon, the defendant(s) violated:

Code Section

18 U.S.C. § 875(c)
18 U.S.C. §§ 2261A(2)(A) and (B)

Offense Description

Transmitting Threats in Interstate Commerce to Injure Another
Cyberstalking

This criminal complaint is based on these facts:

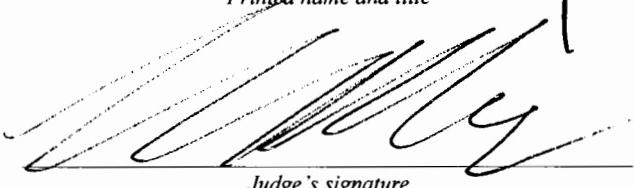
Please see attached affidavit of FBI Special Agent Jeffrey Gray.

Continued on the attached sheet.


Complainant's signature
JEFFREY M. GRAY, Special Agent FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 9/20/19


Judge's signature

City and state: Medford, Oregon

MARK D. CLARKE, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON, ss:

AFFIDAVIT OF JEFFREY M. GRAY

Affidavit in Support of a Criminal Complaint

I, Jeffrey M. Gray, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since April 21, 1991. I am assigned to the Medford Resident Agency of the FBI. My responsibilities include conducting investigations pertaining to persons using interstate facilities to transmit threats to commit violence. My training and experience includes attending the FBI Academy at Quantico, Virginia. I have attended numerous other training sessions concerning criminal investigations and I have conducted investigations and executed search warrants involving the use of interstate communications to transmit threats.

2. I submit this affidavit in support of a criminal complaint and arrest warrant charging William Gregory Douglas, date of birth XX/XX/1983¹, also known by the moniker “LiamXmaiLRevolutionX”, with violation of Title 18, United States Code, Section 2261(A)(2)(A) and (B), Cyberstalking; and violation of Title 18, United States Code, Section 875(c), Transmitting a Threat in Interstate Commerce to Injure Another. As set forth below, there is probable cause to believe, and I do believe, that William Gregory Douglas committed Cyberstalking, in violation of 18 U.S.C. §§ 2261(A)(2)(A) and (B); and that he Transmitted Threats in Interstate Commerce to Injure Another in violation of 18 U.S.C. § 875(c).

Applicable Law

3. Title 18, United States Code, Sections 2261(A)(2)(A) and (B), provides that it is

¹ Where more than one X appears, the X's are concealing Personal Identifying Information (PII). The PII is known to the affiant.

unlawful for a person with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that (A): places that person in reasonable fear of death or serious bodily injury to a person or (B): causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person. Title 18, United States Code, Section 875(c), provides that it is unlawful for a person to transmit in interstate commerce a threat to injure another person.

Statement of Probable Cause

4. On August 27, 2018, Denise Smith of Google Investigations and User Protection contacted the FBI San Francisco Office and provided screen shots of “Tweets” posted on the social medium Twitter by Twitter user LiamXmaiLRevolutionX. The screen shots of the Tweets are as follows:

Tweets:

23 August 2018 - I would kill the 100 YouTube employees if givent he change

@TeamYouTube

23 August 2018 - @TrustedFlagger @TeamYouTube @youtube no more warning expect massive casualties

23 August 2018 - FuCK you @youtube im few hours away and if you are just going to ignore me try ignoring my gun you fucks

*23 August 2018 - You Guys Are fucking Criminals As FuCK FuCK FuCK You
@YOUTUBE you want a bigger mass casualty aka shooting let's see what I can do*

23 August 2018 - Return my channel you low life as Sholes before someone else comes and shoots more of your employees you fucks

22 August 2018 - @TemYouTube you took my channel @TrustedFlagger will no help please fix.

5. Smith advised that his investigation determined that Twitter user LiamXmaiLRevolutionX was associated with You Tube account/channel:
<http://www.youtube.com/channel/XXXXXXXXXXXXXXXXXXXX>. Further, Smith provided the following subscriber information for user name liamxmail:.

YOUTUBE SUBSCRIBER INFORMATION

User name: liamxmail

External Id: X4UshJd_XXXXXXXXXXXX

URL:<http://www.youtube.com/channel/XXXXXXXXXXXXXXXXXXXX>

Mail: Dirlilly66@XXXXXX.com (confirmed)

First Name: liamxmail

IP LOG

| Action Type | Date | IP Address |

| Login | August 27, 2018 at 9:52 PM UTC | 97.90.110.76 |

BILLING INFORMATION:

William G Douglas

Cave Junction, OR 97523

Telephone: XXX-XXX-XXXX

Google account:

Google Account: Dirlilly66@XXXXXX.com

GOOGLE SUBSCRIBER INFORMATION

Name: liamxmail

e-Mail: Dirlilly66@XXXXXX.com

SMS: +1XXX-XXX-XXXX [US]

IP LOG

| Time | IP Address | Type |

| 2018/08/27-21:57:32-UTC | 97.90.110.76 | Login |

6. On August 28, 2018, FBI San Francisco Staff Operations Specialist (SOS) Patrick T. Holleran searched the internet protocol (IP) address 97.90.110.76 in relevant databases and determined the internet service provider (ISP) was Spectrum. The approximate location of the IP address was identified as being in Cave Junction, OR 97523.

7. On August 28, 2018, Operational Support Technician (OST) Spencer H. Kim queried Oregon DMV and NCIC/LEDS for any driver information and criminal history regarding William G. Douglas. OST Kim reported the following results:

Name: William G(regory) DOUGLAS

DOB: XX/XX/1983

Oregon DL No.: XXXXXXXX

Address (as of 20 May 2013): XXXX Rockydale Rd, Cave Junction, OR 97523

8. On September 8, 2018, LiamXmailRevolutionX posted a Tweet stating "*Hey why do you guys keep ignoring me would it be better if I leave you with no other options like your leaving me what your doing us ridiculous I'm beyond pissed at you @youtube so I wonder how I*

should deal with this frustration?"

9. On September 12, 2018, FBI Supervisory Special Agent (SSA) Leland Castro forwarded an email that had been sent by Google employee Chris Celestino. SSA Castro summarized the email to include the following:

The email contained links to three videos as well as one tweet by the subject. In the videos, the subject identifies himself as William Douglas, aka, Liam Douglas, using an "avatar" of LiamXmail. He provided long rants about the "Deep State" and stated he has been "shadow-banned" from YouTube, which he described as a government operation. Douglas stated he is opening a shop on the Redwood Highway between Portland and San Francisco called Revolutionary Donut. On one video, dated September 8, 2018, he stated he has to go to Mountain View to "visit" people at YouTube. Approximately 700 YouTube employs work at YouTube premises located in Mountain View, California.

10. The August 23 tweets make reference about more YouTube employees being shot. According to internet open source reporting, on April 3, 2018, a female named Nasim Najafi Aghdam shot and injured three people at the YouTube headquarters in San Bruno, California. Aghdam was found on the scene with what appeared to be a self-inflicted fatal gunshot wound. Aghdam was reportedly unhappy with YouTube's "policies and practices." According to Aghdam's father, she was an active YouTube user. Aghdam posted accusations that the company was filtering or blocking her contents in order to reduce the number of views her postings received. She was reportedly upset with YouTube decisions to censor the videos she posted and which resulted in reduced revenues.

11. On September 17, 2018 at about 2:15pm, LiamXmaiLRevolutionX posted a

message to @SusanWojcicki. The posting states, “*Susan I’m coming for you today #pray.*”

Susan Wojcicki is the CEO of YouTube.

12. The Twitter profile picture for LaimXmaiLRevolutionX depicts a male. I have compared the Twitter profile picture and the images from the video postings of William Douglas with the photograph appearing on the Oregon Driver’s License of William Gregory Douglas and I believe that they are one in the same person.

13. On September 19, 2018, I spoke with Christopher M. Celestino, the Strategic Security Manager for YouTube. Celestino and I discussed the above described postings. Celestino advised that YouTube has a Social Media Team that monitors their YouTube twitter account. Whenever there are postings to @YouTube and/or @TeamYouTube, members of the Social Media Team receive notifications which would prompt them to check on the YouTube Twitter account for the postings. The Social media team and CEO Wojcicki are physically located at the YouTube facility in San Bruno, California. Further, Celestino advised that the Tweet directed to @SusanWojcicki was viewed by YouTube CEO Susan Wojcicki who voiced her concerns to her security detail and to Celestino personally. Celestino has also been contacted by the lead for Wojcicki’s protective security detail asking for regular updates. YouTube facilities in the northwest have been warned of the threats and pictures of Douglas have been distributed to YouTube facilities for security reasons.

Conclusion

14. Based on the foregoing, I have probable cause to believe, and I do believe, that William Gregory Douglas, committed Cyberstalking, in violation of Title 18, United States Code, Sections 2261A(2)(A) and (B); and Transmitted Threats in Interstate Commerce to Injure

Another in violation of Title 18, United States Code, Section 875(c),

15. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Byron Chatfield, and AUSA Chatfield advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

Subscribed and sworn to before me this 26 day of September 2018.

JEFFREY M. GRAY
Special Agent, FBI

MARK D. CLARKE
United States Magistrate Judge